



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF REGIONAL OFFICES
WESTCHESTER REGIONAL OFFICE

Application granted. Motion due 8/14/2020, opposition due 9/15/2020, reply due 9/29/2020. The Clerk's Office is requested to mail a copy of this Order to the plaintiff.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: New York, New York
July 7, 2020

Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Wing v. C.O. Myers, et al, 18-CV-11056 (PMH)

Dear Judge Halpern:

This Office represents the defendants in the above –captioned pro se matter. I write to respectfully request an extension of time for the defendant to file their motion for summary judgement from July 9, 2020 to August 14, 2020.

The reason for this request is that due to the current world health crisis my office was completely closed for an extended period of time. I am still working remotely; however, I was unable to enter our physical office space for any reason for a long period of time. I was only recently granted permission to enter the office for the limited purpose of retrieving the files. I am hoping to be able to arrange to go and get all of the documents and the files soon. Additionally, I have had difficulties getting necessary documents from DOCCS Albany as their administrative offices have been operating at a limited capacity as well. Lastly, the pandemic has caused substantial changes in my schedule and over all responsibilities which has also made it difficult to meet the previously set deadline. I appreciate the Court's courtesy and understanding during this difficult time and I thank you in advance for even considering this request. This is the first request for an extension of time to file the motion for summary judgment.

Respectfully submitted,

By:

Jennifer Gashi
Assistant Attorney General
44 South Broadway
White Plains, NY 10601
(914) 422-8755

cc:

Dusty Alanson James Wing
Plaintiff Pro Se
Din# 12-B-3014
Sullivan Correctional Facility
P.O. Box 116
Fallsburg, NY 12733-0116